

EXHIBIT B

11/21/2024

Richard Kadrey, et al. v. Meta Platforms, Inc.
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Yann LeCun, Ph.D.

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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE MATTER OF:)	
RICHARD KADREY, et al.,)	
Plaintiff,)	
vs.)	C.A. NO.:
META PLATFORMS, INC.,)	3:23-cv-03417-VC
Defendant.)	

VIDEOTAPED DEPOSITION OF YANN LeCUN, Ph.D.

Palo Alto, California

Thursday, November 21, 2024

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UNDER THE PROTECTIVE ORDER

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1 strategy? 14:31:17

2 A. I have no idea. 14:31:18

3 (Stenographer clarification.) 14:31:26

4 Q. (By Ms. Geman) Rather, do you know in what 14:31:26

5 form the -- the training data is used when -- when 14:31:29

6 portions of it are used for the memorization 14:31:34

7 limitation strategy? 14:31:38

8 A. It's the same format that is used during 14:31:40

9 training and I really don't know. I mean, my guess 14:31:43

10 is that it's just plain text for a lot of those 14:31:45

11 things. 14:31:48

12 Q. Are you familiar with the phenomenon where 14:31:54

13 LLaMA will, in response to a prompt, output 14:31:57

14 copyright-protected text and then it essentially 14:32:03

15 disappears? 14:32:06

16 A. Disappears? 14:32:08

17 Q. Goes off, like it no longer shows up on 14:32:08

18 the -- on the output. 14:32:11

19 MR. WEINSTEIN: Object to form. 14:32:14

20 Q. (By Ms. Geman) Sort of like Snapchat? 14:32:15

21 A. I don't understand the scenario. 14:32:19

22 Q. That somebody does a prompt and says, you 14:32:23

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1 know, give me a -- the first three paragraphs of X. 14:32:26

2 A. Uh-huh. 14:32:33

3 Q. And then LLaMA spits out the first three 14:32:33

4 paragraphs of X, but then it takes it back. 14:32:36

5 A. Oh, I see. 14:32:39

6 This -- this could occur, I believe, 14:32:42

7 because -- because there are systems that are put in 14:32:47

8 place that check whether the continuous output of 14:32:57

9 the LLM either is toxic or inappropriate or 14:33:04

10 infringes copyright and then takes down the text if 14:33:10

11 it does. And that's done, of course, after the text 14:33:14

12 is generated, but the possibility after the text has 14:33:17

13 been shown to the user for a short time. 14:33:27

14 Q. Do you know what that systems [sic] are 14:33:33

15 called? 14:33:35

16 A. No. 14:33:36

17 Q. And do you know if they're put in place 14:33:37

18 after validation of the model? 14:33:40

19 MR. WEINSTEIN: Object to form. 14:33:45

20 Q. (By Ms. Geman) Or let me rephrase the 14:33:46

21 question. 14:33:48

22 At what -- at what stage are those systems 14:33:48

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1 that check continuous output put in place? 14:33:51

2 MR. WEINSTEIN: Object to form. 14:33:57

3 THE WITNESS: Well, they're part of -- 14:33:58

4 okay. 14:34:00

5 So you have the LLM parts of the system; 14:34:00

6 right? So the system like Meta AI or any chatbot is 14:34:03

7 a complex system of multiple modules in interaction. 14:34:09

8 One of them is the LLM and you can use the LLM to 14:34:14

9 produce either a single text or multiple text using 14:34:18

10 the temperature adjustment. 14:34:22

11 You can also change the prompts so you can 14:34:24

12 add a hidden-system prompt to the user prompt to 14:34:27

13 bias the system towards generating certain types of 14:34:32

14 outputs. Okay. 14:34:36

15 So then the system generates multiple 14:34:36

16 outputs and then you can run those through systems 14:34:39

17 that are downstream that checks whether those 14:34:42

18 outputs are correct or incorrect, toxic or 14:34:44

19 non-toxic, you know, copyrighted material or not, 14:34:48

20 and it's -- it's possible that this check takes a 14:34:52

21 while and is expensive which is why you let the 14:34:58

22 system produce the text to the user and then after 14:35:01

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1 the copyright check, for example, has been done, you 14:35:04

2 take down and suppress the output 14:35:07

3 Q. (By Ms. Geman) So could that check only 14:35:12

4 kind of jump in if -- even after multiple pages of a 14:35:13

5 copyright-protected text has shown up? 14:35:18

6 A. No, it doesn't take that long. 14:35:20

7 Q. How long does it take? 14:35:22

8 A. I don't know, but -- but it's on the order 14:35:23

9 of seconds. 14:35:26

10 Q. Okay. 14:35:27

11 And what is -- what is the name of that -- 14:35:27

12 I mean, I asked generally the name of the system. 14:35:29

13 Do you know particularly the name of -- of the 14:35:32

14 system that checks once the output has been 14:35:36

15 released? 14:35:39

16 A. No, I don't know. 14:35:40

17 Q. And how -- how does that -- that system 14:35:40

18 determine whether the output is copyright protected? 14:35:46

19 MR. WEINSTEIN: Calls for speculation. 14:35:51

20 THE WITNESS: So checking copyright is 14:35:55

21 something that Meta has done on its services for a 14:35:56

22 very long time. Because people post copyrighted 14:36:02